

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

---

DANIEL BLACK,

Plaintiff,

v.

Civil Action No. 2:17-cv-00156

DAVID A. CLARKE, JR., et al.

Defendants.

---

**DECLARATION OF BRIAN BARKOW**


---

BRIAN BARKOW declares, pursuant to 28 U.S.C. § 1746 and under penalty of perjury, that the following is true and correct:

1. I make this declaration based upon my own personal knowledge of the facts attested to herein and a review of the business records of the Milwaukee County Sheriff's Office.
2. I make this declaration in support of defendants' motion for summary judgment.
3. I hold the rank of Deputy Inspector with the Milwaukee County Sheriff's Office and oversee the Law Enforcement Analytics Division ("LEAD") within the criminal area of the Sheriff's Office.
4. In my role with LEAD, I am aware of threats and/or derogatory comments against former Sheriff David A. Clarke, Jr., as the threats and comments were forwarded to me via email.
5. I supervised and approved the entry of data from these threats and comments into a matrix as a way to track the individuals communicating the information in order to complete an accurate threat assessment.

6. Attached hereto and marked as **Exhibit A** is a true and correct copy of a matrix containing some of the threats against former Sheriff David A. Clarke, Jr. from July 2016 through July 2017.

Dated this 11th day of September, 2017.

  
\_\_\_\_\_  
Brian Barkow